## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

#### JULIA ZIMMERMAN,

Plaintiff,

Case No. 2:23-cv-11634

VS.

Judge: Hon. Nancy G. Edmunds Magistrate Judge: Hon. Anthony P. Patti

ELIZABETH A. PENSLER, D.O., PLLC (d/b/a "Pensler Vein and Vascular", "Pensler Vein and Vascular Surgical Institute", and "Elizabeth Face + Body Med Spa") *et al.*,

Defendants.

#### **DEBORAH GORDON LAW**

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# THE HEALTH LAW PARTNERS,

P.C.

Clinton Mikel (P73496) Mark V. Breaugh (P84626) Attorneys for the Defendants 32000 Northwestern Highway,

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# **DEFENDANTS' INITIAL WITNESS LIST**

Defendants, by and through their attorneys, The Health Law Partners, P.C., submit the following Initial Witness List.

#### WITNESS LIST

Each witness identified herein is anticipated to provide testimony based on their personal knowledge, observations, and experiences relevant to the facts, circumstances, and issues underlying this case. The witnesses will address matters directly pertinent to the allegations, claims, and defenses raised by the parties, providing factual accounts, professional assessments, and contextually relevant information as warranted.

- 1. Julia Zimmerman, c/o Plaintiff's counsel.
- 2. Dr. Elizabeth Pensler, D.O., c/o Defendants' counsel.
- 3. Dr. Derek Hill, D.O., c/o Defendants' counsel.
- 4. Madisen Carrier, c/o Defendants' counsel.
- 5. Simrath Davidson, c/o Defendants' counsel.
- 6. Jennifer Diaz, c/o Defendants' counsel.
- 7. Adrienne Lieder, c/o Defendants' counsel.
- 8. Madison Gifford, c/o Defendants' counsel.
- 9. Pavlina Goodman.
- 10. Daryl Belding.
- 11. Lindsey Marquardt, c/o Defendants' counsel.
- 12. Rachel Korth, c/o Defendants' counsel.

- 13. Tonya Calamia, c/o Defendants' counsel.
- 14. Amy Mesky, c/o Defendants' counsel.
- 15. Lexi Caza, c/o Defendants' counsel.
- 16. Sandy Jones, c/o Defendants' counsel.
- 17. Any other employees of Defendants, whether current or former, who have information regarding the claims and defenses in this matter. Defendants will supplement this Witness List upon discovering any such relevant individuals.
  - 18. Adam Zimmerman, c/o Plaintiff's counsel.
- 19. Any and all medical providers, including physicians, specialists, and healthcare practitioners, who have examined, treated, or otherwise rendered medical services to Plaintiff in relation to alleged damages, including any assessments, diagnoses, treatment plans, and prognoses relevant to the claims in this matter.
- 20. Any and all mental health professionals, including psychologists, therapists, counselors, and other licensed practitioners, who have evaluated, counseled, or provided mental health services to Plaintiff concerning alleged emotional or psychological damages pertinent to the claims in this case.
- 21. Any and all other individuals who have information regarding Plaintiff's alleged damages in this matter.

22. Any and all individuals identified in discovery, including in any documents produced or any deposition(s) testimony.

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23. Any and all witnesses identified by Plaintiff.

24. Any and all rebuttal and expert witnesses, including any expert

witnesses now or later identified by any party.

25. Any and all witnesses who are necessary to lay the foundation for the

admission of evidence.

26. Defendants specifically reserve the right to amend and add to this

Initial Witness List the names of further witnesses and expert witnesses as further

information becomes available and/or as Defendants deem necessary to their case.

Dated: October 28, 2024,

Respectfully submitted,

THE HEALTH LAW PARTNERS, P.C.

/s/ Clinton Mikel

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### **CERTIFICATE OF SERVICE**

I certify that on October 28, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send email notification of electronic filing to counsel for all parties of record.

s/Clinton Mikel
Clinton Mikel
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